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Attorneys for Plaintiff

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

AMARJEET KAUR,

Defendant.

No. CR 09-00319 PVT

STIPULATION AND ~~PROPOSED~~
ORDER CONTINUING STATUS
HEARING AND EXCLUDING TIME
UNDER THE SPEEDY TRIAL ACT

SAN JOSE VENUE

The undersigned parties respectfully request that the status hearing scheduled for May 21, 2009 be continued to June 22, 2009. The reason for the continuance is that Anne Beles, who represents the defendant, will be out of town until May 20, 2009 and needs additional time to review discovery. Therefore, the parties are requesting a continuance to June 22, 2009 at 11:00 a.m. for status hearing. In addition, the parties agree and stipulate that a waiver of time under the Speedy Trial Act from May 21, 2009 to June 22, 2009 is appropriate. The parties agree and stipulate that an exclusion of time is appropriate based on the defendant's need for continuity and effective preparation of counsel.

1 SO STIPULATED:

JOSEPH P. RUSSONIELLO
United States Attorney

3 DATED: 5/13/09

/s/
SUSAN KNIGHT
Assistant United States Attorney

5 DATED: 5/13/09

/s/
ANNE BELES
Counsel for Ms. Kaur

8 Accordingly, the Court HEREBY ORDERS that the status hearing is continued to June 22,
9 2009 at 11:00 a.m.

10 For good cause shown, the Court FURTHER ORDERS that time be excluded under the
11 Speedy Trial Act from May 21, 2009 through June 22, 2009. The Court finds, based on the
12 aforementioned reasons, that the ends of justice served by granting the requested continuance
13 outweigh the best interest of the public and the defendant in a speedy trial. The failure to grant
14 the requested continuance would deny defense counsel reasonable time necessary for effective
15 preparation, taking into account the exercise of due diligence, and would result in a miscarriage
16 of justice. The Court therefore concludes that this exclusion of time should be made under 18
17 U.S.C. §§ 3161(h)(8)(A) and (B)(iv).

18 SO ORDERED.

20 DATED: 5/13/09


PATRICIA V. TRUMBULL
United States Magistrate Judge